

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-1-3)
August 4, 1998

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Gail Willette
Acting Director
Office of the Consumer Advocate

Emmett Rand Costich

Emmett Rand Costich
Acting Assistant Director



OCA/USPS-1. The following interrogatory refers to USPS-LR-2/MC98-1, page 31, where the following statement appears: "... [T]he Postal Service provided us with an estimate of the percentage of the eligible universe who they believe would be aware of NetPost" Please explain how each of the five "awareness adjustment factors" was derived. Cite all sources used in developing the percentage factors and provide copies of each source not previously filed in this docket.

OCA/USPS-2. The following interrogatory refers to USPS-LR-2/MC98-1, page 31, where the following statement appears: "... [T]he Postal Service provided us with an estimate of the percentage of the eligible universe whom they believe would have compatible hardware and software platforms" Please explain how each of the five estimates for "access to compatible hardware and software adjustment factors" was derived. Cite all sources used in developing the factors and provide copies of each source not previously filed in this docket.

OCA/USPS-3. The following interrogatory refers to USPS-LR-2/MC98-1, page 32, where the following statement appears: "The actual number of businesses with Internet access over the next five years was supplied to us by the Postal Service." Please explain how each of the 5 estimates for the "Internet access adjustment factor" was derived. Cite all sources used in developing the factors and provide copies of each source not previously filed in this docket.

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.


Emmett Rand Costich
Attorney

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August 4, 1998